

1 Suzanne L. Martin  
2 Nevada Bar No. 8833  
3 [suzanne.martin@ogletreedeakins.com](mailto:suzanne.martin@ogletreedeakins.com)  
4 Brian L. Bradford  
5 Nevada Bar No. 9518  
6 [brian.bradford@ogletreedeakins.com](mailto:brian.bradford@ogletreedeakins.com)  
7 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
8 Wells Fargo Tower  
Suite 1500  
3800 Howard Hughes Parkway  
Las Vegas, NV 89169  
Telephone: 702.369.6800  
Fax: 702.369.6888

9 *Attorneys for Defendant*  
10 *CDI Contractors*

11 **UNITED STATES DISTRICT COURT**

12 **FOR THE DISTRICT OF NEVADA**

13 RICHARD VELA, an individual,

14 Plaintiff,

15 vs.

16 CDI CONTRACTORS, LIMITED  
17 LIABILITY COMPANY;  
18 EMPLOYEE(S)/AGENT(S) DOES 1-10; and  
ROE CORPORATIONS 11-20, inclusive,

19 Defendants.

Case No. 2:15-cv-01230-JAD-VCF

**STIPULATION AND ORDER FOR**  
**EXTENSION OF TIME TO RESPOND**  
**TO DEFENDANT'S PARTIAL MOTION**  
**TO DISMISS AND REQUEST TO**  
**VACATE HEARING**  
**(FIRST REQUEST)**

20 Pursuant to LR 6-1, 6-2, and 7-1, Plaintiff Richard Vela ("Plaintiff") and Defendants CDI  
21 Contractors, Limited Liability Company ("Defendants"), by and through their respective counsel,  
22 have agreed to an extension of time of 30-days for Plaintiff to file a response to Defendant's  
23 pending partial Motion to Dismiss (Doc. # 2), which was filed on June 29, 2015. The current  
24 deadline for Plaintiff to file a response is July 16, 2015. The 30-day extension would result in a  
25 new filing deadline of August 17, 2015 (technically, 30-days would be August 15, 2015, however,  
26 that is a Saturday).

27 The parties also respectfully request that the Court vacate the August 3, 2015 hearing date  
28

1 on the motion.

2 The purpose of these requests is to provide the parties with an opportunity to engage in  
3 early settlement discussions without incurring what may be unnecessary fees and costs in  
4 connection with law and motion.

5 This is the parties' first request.

6 Accordingly, the parties hereby stipulate and agree as follows:

7 IT IS HEREBY STIPULATED that Plaintiff will have up to and including August 17,  
8 2015, to file a response to Defendant's partial Motion to Dismiss (Doc. # 2).

9 IT IS FURTHER REQUESTED that the Court vacate the August 3, 2015, hearing date on  
10 the Motion.

11 This stipulation is made in good faith and is not intended for purposes of delay, but in the  
12 interest of judicial economy to allow the parties to further early settlement discussions without  
13 incurring attorneys' fees and costs through law and motion.

14 Dated this 14<sup>th</sup> day of July, 2015.

Dated this 14<sup>th</sup> day of July, 2015.

15 JEFFREY GRONICH, ATTORNEY AT LAW,  
16 P.C.

OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P.C.

17 /s/ Jeffrey Gronich

/s/ Suzanne L. Martin

Jeffrey Gronich  
18 1810 E. Sahara Avenue, Ste. 109  
Las Vegas, NV 89104  
19 Attorney for Plaintiff

Suzanne L. Martin  
Brian Bradford  
Wells Fargo Tower  
Suite 1500  
3800 Howard Hughes Parkway  
Las Vegas, NV 89169  
Attorneys for Defendants

22 **ORDER**

23 IT IS SO ORDERED.  
The hearing on [2] Motion to Dismiss is reset to September 21, 2015, at 11:00 a.m. in LV  
24 Courtroom 6D before Judge Jennifer A. Dorsey.



25 UNITED STATES DISTRICT COURT JUDGE

27 July 16, 2015.

28 Dated